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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ALEXIS HARRINGTON, O/B/O)
G.M.D, a minor,)
Plaintiff,) CASE NO.
v.) 2:23-cv-02053-MDC
)
) CONSENT MOTION
) FOR EXTENSION OF TIME TO FILE
) PLAINTIFF'S BRIEF
MARTIN O'MALLEY,)
COMMISSIONER OF SOCIAL SECURITY,)
Defendant.)

Plaintiff, Alexis Harrington, by her attorney, moves for a sixty (60) day extension of time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed March 11, 2024.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance, between February 26, and May 7, 2024, staff in Counsel's office have one hundred and sixty-four (164) Plaintiff briefs due. This figure does not include briefings which will be due after the filing of Administrative Records throughout this timeframe, Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly

1 prepare the brief by the current deadline. This request will not cause Defendant any undue
2 hardship. This extension is needed to thoroughly and properly prepare the brief.

3
4 Wherefore, Plaintiff requests an extension from March 11, 2024, up to and including May
5 10, 2024, to file her brief. Counsel for the Plaintiff has conferred with Defendant's Counsel who
6 kindly consents to this request.

7 Dated March 4, 2024

8 Respectfully submitted,

9
10 */s/Hal Taylor*
11 Hal Taylor, Esq.

12 **Plaintiff's Certificate of Service:**

13 I certify that I caused the Consent Motion for Extension of Time to be served today,
14 March 4, 2024, by CME/CF to Blaine T. Welsh, Esq., and Edmund (Jack) Darcher , Esq., who
15 are filing users of the CM/ECF system.

16
17 */s/Hal Taylor*
18 Hal Taylor

19 **IT IS SO ORDERED.**

20
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23 Maximiliano D. Couvillier III
24 United States Magistrate Judge
25 Dated: 3-12-24
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